

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-CV-22787-SCOLA/GOODMAN

LIORA SAMANDAROVA,

Plaintiff,

vs.

HOOCAH EXOTIX LLC, JEAN-
CHRISTOPHE PITTMAN, AND
ALEXANDRE ARKHIPOV,

Defendants.

**PLAINTIFF'S MOTION FOR ENTRY OF CLERK'S DEFAULT
AGAINST DEFENDANT, ALEXANDRE ARKHIPOV**

Plaintiff, Liora Samandarova, through undersigned counsel and pursuant to Fed. R. Civ. P. 55 and other applicable Rules and laws, moves the Clerk of Court to enter a Default against Defendant, Alexandre Arkhipov, based on the following good cause:

1. Plaintiff, Liora Samandarova, served the Summons and Complaint on Defendant, Alexandre Arkhipov, on October 5, 2022. [ECF No. 8.]
2. Mr. Arkhipov filed his Answer to the Complaint with the Court on October 26, 2022. [ECF No. 10.]
3. Mr. Arkhipov proceeded to then ignore the Court's authority to the point that he violated three Orders from the Court. [ECF No. 24.]
4. The Court ultimately struck Mr. Arkhipov's Answer and directed Plaintiff to request the entry of a Clerk's Default due to the absence of any response to the Complaint. [ECF No. 24.]

MEMORANDUM OF LAW

“In the courts, there is room for only so much lenity. The district court must consider the equities not only to plaintiff and his counsel, but also to the opposing parties and counsel, as well as to the public, including those persons affected by the court's increasingly crowded docket.” *Young v. City of Palm Bay, Fla.*, 358 F.3d 859, 864 (11th Cir. 2004).

WHEREFORE Plaintiff, Liora Samandarova, requests the Clerk of Courts to issue a Default against Defendant, Alexandre Arkhipov, due to the absence of a response to the Complaint, and to award such other and further relief as the Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on this 24th day of January 2023 through filing in CM/ECF, and by email on Defendant, Alexandre Arkhipov, *pro se*, by email at bonamicoalex@gmail.com, 8028 N.W. 11th Ave., A, Miami, FL 33150, on this 17th day of January 2023.

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